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FILE COPY

To: Oregon Department of Environmental Quality
750 Front St. NE, Suite 120
Salem, OR 97301-1039

Date: May 26,1999

Attn: Gil Hargreaves / Cheryll Parr

Re: Industrial Effluent / Hazardous Waste Determination

Gil,

I would greatly appreciate the Department's assistance in answering some questions and providing some guidance relative to PII's hazardous waste determination of its industrial wastewater. My specific questions are as follows:

1. At lead levels of 5.0 mg/l and above solutions are classified as D008 characteristic hazardous wastes. D008 hazardous wastes require treatment to 40CFR 268.40 and 268.48 standards (0.69 mg/l or below) before land disposal is allowed. 40CFR 268.3(a) prohibits dilution as a substitute for adequate treatment to achieve compliance with the 268.40 and 268.48 standards. How do these standards affect handling and treatment requirements for waste waters containing lead concentrations less than 5.0 mg/l but greater than 0.69 mg/l? Metal-bearing rinse waters are routinely co-mingled for treatment in PII's WTU, and under the current configuration rinse waters containing low levels of metals may be directed to final pH adjustment.
2. How does the 40CFR 268.3 prohibition on dilution apply to rinse waters? The term rinsing, when applied to the removal of a soluble chemical or contaminant, by definition involves dilution. The dilution is not being performed to avoid a treatment standard, but is performed in order to maintain product and process quality. What is the proper method of determination for continuous waste streams or wastewaters whose concentrations of potentially regulated contaminants vary and may cross back and forth over regulatory thresholds?
3. PII processes mixed copper/lead waste waters. This process is not regulated or prohibited under the CWA. 40CFR 268.3(d), however, states that it is an impermissible form of dilution to add metallic iron fillings to any lead containing hazardous waste. This prohibition apparently applies, regardless of whether or not lead was the basis for the material's characterization as a hazardous waste. PII's treatment process for copper removal is based on iron cementation, adding reduced iron powder to remove copper from solutions in a concentrated metallic form. This method is so effective that our solids have a significantly increased value for metals reclamation. In fact, use of this methodology resulted in the granting of a

variance from RCRA hazardous waste regulations for our solids, formerly classified as a F006 waste. Our experience shows that addition of reduced iron powder has no effect on lead and nickel concentrations. Subsequent pH adjustment is used to precipitate those metals in order to achieve discharge standards. Would the application of 40CFR 268.3(d) to our WTU system render our current process illegal?

The City of Dallas has informed me that our next meeting is scheduled for tomorrow at 1:00pm in your Salem offices. I look forward to seeing you there to address some of these RCRA questions as well as TTO issues.

Sincerely,

Bret Bruhn / PII-Dallas